

August 20, 2004

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

FROM: Stephen D. Dingbaum/**RA**  
Assistant Inspector General for Audits

SUBJECT: MEMORANDUM REPORT: CONTROLS TO  
PREVENT UNAUTHORIZED ENTRY INTO THE  
NRC PARKING GARAGE (OIG-04-A-17)

**SUMMARY**

The Office of the Inspector General (OIG) conducted a limited scope review to assess U.S. Nuclear Regulatory Commission (NRC) controls for preventing and mitigating unauthorized vehicle entries into the NRC headquarters parking garage. OIG initiated this inquiry in response to an incident that occurred on April 28, 2004, when a disoriented woman who had no official business with NRC drove into the One White Flint North parking garage without stopping at the guard booth. Approximately 15 minutes after entering the garage, the woman walked out of the garage at the Two White Flint North exit, where she was stopped and questioned by an NRC guard who was unaware that the security breach had occurred.

NRC determined that the security guard response to this incident was unsatisfactory, deducted \$400 from the security guard contractor invoice for April because of the poor response, and requested an action plan from the contractor to improve future performance. The contractor responded by providing remedial training for its NRC guard force. In addition, the Director, Division of Facilities and Security, instructed Security Branch staff to develop specific guidance for security officers on how to respond to unauthorized access situations.

OIG found that although NRC responded quickly to address the poor performance demonstrated by the guard force on April 28, the agency should implement emergency drill training requirements contained in the security guard contract and clarify security guard orders to ensure a better security guard response in the future.

### **DESCRIPTION OF INCIDENT**

On April 28, 2004, at approximately 5:40 a.m., a disoriented woman who had no official business with NRC drove past the guard posted at the One White Flint North driveway booth and into the garage without stopping. The guard immediately notified the shift supervisor, via telephone, that an NRC “employee” had entered the garage without stopping. The supervisor subsequently made a brief, limited in scope, unsuccessful attempt to locate the driver and then returned to his office to obtain more information. However, instead of continuing his search, the supervisor issued weapons to officers reporting for duty without making any notification to the guard force about the situation at hand. The woman spent about 15 minutes walking around the garage before being detained by a guard at the Two White Flint North garage exit post who thought the woman appeared suspicious. At the time the guard stopped her, the woman, who was not wearing shoes, had just walked out of the Two White Flint North garage. During this entire time period, officers were not notified that the breach had occurred and no organized search for the vehicle or driver was conducted. Furthermore, the woman was not searched before she was brought back inside the building for further questioning. The woman’s vehicle, which was subsequently impounded by Montgomery County Police, was found on the P-1 level of the Two White Flint North garage and a coat she dropped while wandering in the garage was found on the Two White Flint North P-2 ramp. According to a Division of Facilities and Security staff member, a switchblade knife was found in the woman’s vehicle.

### **NRC AND WACKENHUT RESPONSE TO INCIDENT**

Both NRC and Wackenhut Services, Inc., NRC’s contractor for guard services, agreed that the guard force response to the incident was unsatisfactory. In a May 5, 2004, letter to Wackenhut, NRC faulted the shift supervisor for failing to alert the guards on duty that there was an intruder in the building and found it unacceptable that an effective search for the intruder was not immediately conducted. NRC also criticized the fact that the woman was not properly searched before being brought back into the building for questioning. NRC deducted \$400 from Wackenhut’s April 2004 invoice because of the contractor’s poor performance and requested that Wackenhut provide a written plan of action to improve future performance. In response, on May 10, Wackenhut provided onsite remedial training for its NRC guard force on the use of deadly force, emergency communications, alert procedures, response timeliness, supervisor responsibilities in general, and other topics.

According to the Wackenhut project manager for the NRC contract and Division of Facilities and Security staff, an underlying cause of Wackenhut's poor response was the mischaracterization of the intruder as an NRC "employee." The supervisor failed to question this characterization and responded to the incident as if it were not an emergency. Another problem, according to the project manager, was the driveway booth guard's failure to use his radio to notify the supervisor about the incident. Had the guard used his radio, the project manager said, all officers on duty at the time would have been alerted about the situation. The project manager said using one's radio to make the call to the supervisor is a commonsense response that ought to be automatic.

OIG notes that an appropriate response to this situation would also include the use of a duress alarm that immediately notifies all posts that a potentially dangerous situation is underway. Because NRC's duress alarms do not have this capability – they notify only the Central Alarm Station of imminent danger – NRC guards must use their radios to perform this type of general notification.

In an effort to further ensure that guards understand what NRC expects of them in an emergency, the Division of Facilities and Security Director has directed Security Branch staff to develop more specific guidance for guards on how to respond to access control incidents. While Division of Facilities and Security staff cautioned OIG that responses cannot be prescribed for every emergency scenario, they acknowledged that fundamental expectations ought to be documented.

### **ACCESS CONTROL EMERGENCY DRILLS ARE NOT PART OF GUARD TRAINING REQUIREMENTS**

Although Wackenhut responded promptly to NRC's request for a plan of action to improve future performance, neither the remedial training that was provided nor the annual contract guard training requirements included the conduct of access control emergency response drills. Such drills would allow guards to practice access control procedures in response to incidents similar to that which occurred on April 28. Such practice would help ensure that officers have practiced the skills required to respond to emergencies and that they are better prepared to act quickly and appropriately if a similar situation occurs in the future.

NRC's contract with Wackenhut requires guards to receive basic training, in-service training, and annual recertification training. One specific requirement pertains to emergency response capability and requires NRC to conduct periodic testing to ensure an acceptable level of training by security personnel for response to emergencies. However, NRC has not conducted access control emergency drills as part of this testing requirement. Furthermore, the remedial training provided by Wackenhut in response to the April 28 incident did not include any access control emergency drill training. According to the Division of

Facilities and Security Director, while no access control emergency drill training has been conducted, the guards have participated in bomb emergency drills which call for a similar response to that required in an access control emergency.

According to the Wackenhut project manager for the NRC contract, it is easy for guards to become desensitized to the emergency nature of their jobs because so few incidents necessitating an emergency response occur. To help counter this tendency, the project manager said he rotates guards in and out of various posts and reminds them verbally of the importance of taking all situations seriously. Furthermore, he said, officers practice access control every day on the job.

OIG contends that access control drills should be an integral part of annual officer training. Although the guards practice access control on a routine basis, the rare occurrence of emergency situations does not provide the opportunity to practice the quick thinking and aggressive response required in these situations. Furthermore, while the remedial training provided by Wackenhut is likely to ensure that guards take all incidents seriously in the short term, there is no assurance that such heightened awareness will be sustained over the long term. Drilling annually on how to respond to access control emergencies will routinely remind guards of the need to treat all security breaches as potentially serious, ensuring an appropriate response to such situations.

### **Recommendation**

OIG recommends that the Executive Director for Operations:

1. Require the conduct of at least one annual access control emergency drill as part of security guard training requirements.

### **GUARD ORDERS DO NOT DESCRIBE EXPECTED RESPONSE**

NRC has specific post and general orders<sup>1</sup> addressing garage access control. However, these written procedures are not specific enough to ensure that guards have a clear understanding of how to proceed in an emergency.

NRC's post and general orders contain guidance intended to prevent unauthorized individuals and vehicles from entering the garage and appropriately handle such an entry should one occur. NRC General Order 10, Access Control, informs security officers of the policy and procedures for access control to ensure that only authorized personnel are admitted to controlled areas. NRC Post Order 7 describes access control duties at the perimeter driveway guard booth during

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<sup>1</sup> NRC post orders are permanent directives designed to provide procedures for the operation of each individual guard post. These directives augment and supplement NRC general orders, which are permanent directives designed to standardize day-to-day procedures at all NRC facilities.

specific hours of the day and night and is augmented by an attachment titled, “Standard Operating Procedures for Perimeter Driveway Guard Booth.” This latter document includes information on when to lower and raise the traffic arm located at that post and the roll-up garage doors.

OIG’s review of these specific procedures revealed that the procedures do not:

**Clearly state “commonsense” expectations on how to proceed in an emergency.** Division of Facilities and Security staff and the Wackenhut project manager expressed various “commonsense” principles that they said officers should have known to employ during the April 28 incident. For example, the project manager stated that the officer should have used his radio – not the telephone – to notify the shift supervisor that the incident had occurred. The project manager said this was a basic principle in responding to an emergency because it facilitates notification of all guards that an incident is underway. Yet, the requirement to use the radio to alert officers of an unauthorized vehicle entry is not specifically written in NRC’s post or general orders. A Division of Facilities and Security staff member further explained that a duress alarm located in the driveway guard booth is to be used to notify the Central Alarm Station in situations of imminent danger. Guidance on when to use the duress alarm – versus the telephone or radio – also is not specified in the orders.

**Describe a response that matches NRC’s expectations on how to proceed in an emergency.** According to Division of Facilities and Security staff, a reasonable response in the April 28 situation would have been immediately to stop traffic from entering or exiting the garage until the vehicle and driver could be located. However, there are no specific procedures in General Order 10, Access Control, or Post Order 7 (perimeter driveway guard booth) instructing officers when such a technique is advisable. As another example, General Order 10 instructs guards who encounter individuals in the building who are unauthorized to be there to escort them from NRC space. While the order specifies that the person should be asked to leave “in a firm and polite manner,” no mention is made of the need to detain the person in order to ascertain how and why the person entered the space. According to the Wackenhut project manager and NRC staff, such questioning would be necessary in order to assess whether the person intended to cause harm and to determine what weakness allowed the person to gain access in the first place.

### **Recommendation**

OIG recommends that the Executive Director for Operations:

2. Update general and post orders related to access control so that the guidance clearly conveys NRC expectations for guard response as well as “commonsense” expectations concerning emergency response.

## **CONCLUSION**

The April 28 security breach fortunately occurred without malice in that the intruder entered the garage because she was disoriented and apparently not to cause harm to NRC facilities or employees. However, it illustrates the vulnerability posed by the existing driveway configuration, which does not include active vehicle barriers. According to Division of Facilities and Security staff, an intruder currently can gain easy entry into the garage any time the garage door is open and there is virtually nothing in place to prevent this. Ultimately, NRC expects to mitigate this vulnerability by reconfiguring the driveway access to the garage through Lot 4.<sup>2</sup> Even when the driveway reconfiguration is complete, however, NRC must employ the best possible measures to prevent intrusions and respond appropriately if one occurs.

## **AGENCY COMMENTS**

During an exit conference held August 3, 2004, agency managers generally agreed with the report findings and recommendations, and offered clarifications concerning NRC's security guard contract requirements and a suggestion concerning the wording of Recommendation 1. This information was incorporated into the report, as appropriate. The agency reviewed these modifications and did not provide subsequent comments to the report.

## **Consolidated List of Recommendations**

1. Require the conduct of at least one annual access control emergency drill as part of security guard training requirements.
2. Update general and post orders related to access control so that the guidance clearly conveys NRC expectations for guard response as well as "commonsense" expectations concerning emergency response.

## **SCOPE AND METHODOLOGY**

To accomplish this limited scope review assessing NRC's controls to prevent unauthorized entry into the agency's headquarters garage, auditors reviewed relevant criteria such as the General Services Administration Contract Guard Information Manual; NRC Security Officer's Book, which contains general and post orders; "Standard Operating Procedures for Perimeter Driveway Guard Booth," attachment to Post Order 7; and the Wackenhut Statement of Work for Security Guard Services. Auditors also reviewed security incident reports describing the April 28 incident and NRC's letter to Wackenhut subsequent to the incident. Auditors interviewed Division of Facilities and Security staff and the Wackenhut project manager to better understand the events that transpired during the April 28 security breach and the agency's and contractor's responses.

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<sup>2</sup> Lot 4 is the vacant lot behind One White Flint North acquired last year for this purpose.

This work was conducted from June 3 to June 29, 2004, in accordance with generally accepted Government auditing standards. The work was conducted by Beth Serepca, Team Leader; Judy Gordon, Senior Management Analyst; and Elizabeth Bowlin, Auditor.

Please provide information on the actions taken in response to the recommendations directed to your office by September 20, 2007. Actions taken or planned are subject to OIG followup. See Attachment for instructions for responding to OIG report recommendations.

If you have any questions or concerns regarding this report, please contact me at 415-5915 or Beth Serepca at 415-5911.

cc: Chairman Diaz  
Commissioner McGaffigan  
Commissioner Merrifield

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